COURTNEY M. PRICE VICE PRESIDENT CHEMSTAR



201-14980

December 29, 2003

OPPT CBI

Via Messenger and CD-Rom

Michael O. Leavitt, Administrator U.S. Environmental Protection Agency P.O. Box 1473 Merrifield, VA 22116

Re:

Fatty Nitrogen Derivatives Panel Nitriles Task Group, Consortium No. HPV Chemical Challenge Program Submission of Nitriles Category Justification and Testing Rationale

Dear Administrator Leavitt:

The Fatty Nitrogen Derivatives Panel Nitriles Task Group of the American Chemistry Council submits the subject documents to EPA's HPV Chemical Challenge Program as its test plan for a category covering 14 chemicals. The Nitriles Task Group includes the following member companies that are sponsoring these chemicals under the Voluntary HPV Chemical Challenge Program: Akzo Nobel Chemicals Inc.; Crompton Corporation; and Goldschmidt Chemical Corporation.

This submission includes the following documents:

- Fatty Nitrogen Derived Nitriles Category High Production Volume (HPV) Chemical Challenge – Assessment of Data Availability and Test Plan and
- Appendix A: Robust Summaries for Reliable Studies.

Due to the size of the files, this submission is also being sent via CD-Rom to the above address. An email will be sent to the following email addresses to notify EPA of the submission:

Oppt.ncic@epa.gov Chem.rtk@epa.gov Michael O. Leavitt Nitriles Category HPV Chemical Challenge Program December 29, 2003 Page 2 of 2

If you require additional information, please contact F. J. "Sonny" Maher, Fatty Nitrogen Derivatives Panel Manager at (703) 741-5605 or sonny_maher@americanchemistry.com.

Sincerely yours,

Courtney M. Price Vice President, CHEMSTAR

Attachment cc: Nitriles Task Group Steve Russell, ACC Jim Keith, ACC